

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

May 21, 2024

United States of America

v.

Bakr Saad Al Dyni

Nathan Ochsner, Clerk of Court

Case No. **4:24-mj-221**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 19, 2022 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 21 U.S.C. 841

Knowingly Intentionally and Willfully possess with the intent to distribute a controlled substance. The substance involved 5 kilograms or more of a detectable amount of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Derrick Jaradi*

Complainant's signature

Derrick Jaradi, FBI TFO

Printed name and title

Sworn to by telephone and signed
electronically and I find probable causeDate: May 21, 2024City and state: Houston, Texas*Yvonne Y. Ho*

Judge's signature

Yvonne Y. Ho, United States Magistrate Judge

Printed name and title

4:24-mj-221**Affidavit in Support of Criminal Complaint**

I am a Task Force Officer (TFO) of the Federal Bureau of Investigation's Houston Coastal Safe Streets Task. As such, I am empowered under Title 21, United States Code, Section 878, to enforce Title 21 and other criminal laws of the United States, to make arrests and obtain and execute search, seizure and arrest warrants. I have been so employed by the Federal Bureau of Investigation (FBI) as a FBI TFO since January of 2020. Currently, I am assigned to the FBI Texas City Residence Agency. In connection with my official duties, I investigate criminal violations of Controlled Substances Act. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. In connection with my duties and responsibilities as a law enforcement officer, I have testified in judicial proceedings for violations of laws concerning controlled substances. I have participated in numerous drug trafficking investigations, including investigations that have resulted in felony arrests for violations of Title 21 of the United States Code. I have been involved in various types of electronic surveillance, in the execution of search and arrest warrants, and in the debriefing of defendants, witnesses and informants, as well as others who have knowledge of distribution and transportation of controlled substances, and of the laundering and concealing of proceeds from controlled substances trafficking.

In July of 2022, Agents recruited a confidential human source (CHS), who indicated that a Houston based cocaine supplier was going to be providing the CHS with multiple kilograms of cocaine. The CHS indicated that the cocaine was a test amount to determine if the quality of cocaine was good.

On July 19, 2022, Agents with the FBI Houston Coastal Safe Streets Task Force conducted an operation wherein five (5) kilograms of cocaine were delivered to a CHS. Prior to the operation, the CHS indicated that the CHS was directed to meet with the subject, later identified as Bakr Saad Al Dyni (AL DYNI), at the address of 5512 Memorial Dr., Houston, TX (Black Walnut Café). During the operation, Agents set up surveillance in the vicinity of the Black Walnut Café. Agents observed a silver Ford F150 bearing Texas license plate number PYW-6415 pull into the parking lot of the business. Agents later learned the F150 was registered to AL DYNI. Agents observed AL DYNI exit the Ford F150 and retrieve a brown paper bag from the rear of the F150. Agents observed AL DYNI place the brown paper bag into the rear back seat of the CHS's vehicle. After providing the CHS with the paper bag, AL DYNI re-entered the F150 and departed the location. Immediately after the transaction Agents retrieved the brown paper bag from the CHS's vehicle. Agents learned the paper bag contained five (5) bundles of white powdery substance which later was tested by a DEA laboratory and confirmed to be cocaine.

On July 25, 2022, the CHS indicated that the CHS was directed by unidentified subjects in Canada to return the five (5) kilograms of cocaine due them being poor quality. The CHS was directed by subjects in Canada to contact telephone number (903) 500-5359 and coordinate the drop off. At the directions of Agents, the CHS contacted the telephone number and spoke with AL DYNI. AL DYNI directed the CHS to meet AL DYNI at the same Black Walnut Café. On this day Agents conducted an operation wherein the CHS provided AL DYNI with five (5) kilograms of fake bundles of cocaine.

The bundles were created by Agents to mimic the five (5) real bundles that were originally provided by AL DYNI.

During the July 25, 2022 operation, Agents set up surveillance in the vicinity of the Black Walnut Café. Agents observed AL DYNI arrive in the silver F150. The CHS then provided AL DYNI with the five (5) fake bundles of cocaine which was concealed in a gray backpack. Agents observed AL DYNI take the backpack and depart the location. Agents continued surveillance on AL DYNI who travelled to AL DYNI's registered address of 8751 Distant Woods Dr., Houston, TX. After AL DYNI arrived, Agents obtained a federal search warrant in the Southern District on AL DYNI's residence.

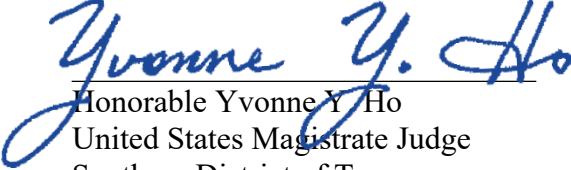
On July 25, 2022, the FBI SWAT team executed a search warrant on AL DYNI's residence. During the search, Agents located and seized the five (5) fake bundles of cocaine, an additional 500 grams of cocaine, and two (2) firearms which were located in the attic of the residence.

Based on my experience and the aforementioned facts and observations, your affiant believes there is probable cause to believe that AL DYNI on July 19, 2022, did knowingly, intentionally, and unlawfully possess with intent to distribute approximately five (5) kilograms of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections, 841(a)(1) and 841(b)(1)(A)(i).

Derrick Jaradi

TFO Derrick Jaradi
Federal Bureau of Investigation

Sworn to and subscribed before me telephonically, on this 21st day of May,
2024, And I hereby find probable cause.


Honorable Yvonne Y. Ho
United States Magistrate Judge
Southern District of Texas